

EXHIBIT B

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE TEZOS SECURITIES LITIGATION

This document relates to:

ALL ACTIONS.

Master File No. 17-cv-06779-RS

CLASS ACTION

**DECLARATION OF ARTIOM FRUNZE
IN SUPPORT OF MOTION TO BE
APPOINTED LEAD PLAINTIFF**

Date: March 7, 2019

Time: 1:30 p.m.

Crtrm: 3

Judge: Hon. Richard Seeborg

1 I, ARTIOM FRUNZE, declare as follows pursuant to 28 U.S.C. § 1746:

2 1. I respectfully submit this Declaration in support of Plaintiffs' Motion to Withdraw
3 Lead Plaintiff and Substitute New Lead Plaintiff, filed in the above-captioned action.

4 2. I am a named plaintiff in this lawsuit and have reviewed the Consolidated Class Action
5 Complaint filed in this lawsuit on April 3, 2018 (Dkt. No. 108), as amended pursuant to the
6 stipulations and orders entered on November 21, 2018 (Dkt. No. 183) and January 7, 2019 (Dkt No.
7 186).

8 3. I am willing to serve as Lead Plaintiff either individually or as part of a group. I
9 understand that the Lead Plaintiff is a representative party who acts on behalf of other class members
10 in directing the litigation. I understand and accept the responsibilities and obligations of serving as a
11 Lead Plaintiff, which include providing testimony at deposition and trial, if necessary. I am willing
12 to oversee the vigorous prosecution of this litigation.

13 4. I invested in the Tezos Initial Coin Offering (the "Tezos ICO"), which was held in
14 July 2017. The dates and amounts of my investments, as well as the number of Tezos tokens (XTZ)
15 that I was promised, were as follows:

Investment	Trade Date	Amount of XTZ Promised
20 ETH	July 2, 2017	13,953.72
98 ETH	July 2, 2017	68,716.62
120 ETH	July 3, 2017	82,937.04

21 5. I did not purchase the Tezos tokens at the direction of counsel or in order to participate
22 in this lawsuit.

23 6. I will not, either directly or indirectly, accept any payment for serving as a
24 representative party on behalf of the Class beyond my *pro rata* share of any recovery, except such
25 reasonable costs and expenses (including lost wages) directly relating to the representation of the
26 Class, as approved or ordered by the Court.
27
28

1 7. I have not sought to serve, and have not served, as a representative party in any other
2 class action filed under the federal securities laws within the last three years.

3 I declare under penalty of perjury under the laws of the United States of America that the
4 foregoing statements relating to me are true and correct to the best of my knowledge.

5 Executed this 22nd day of January, 2019 at Richlands, Australia.

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8 ARTIOM FRUNZE
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